

July 9, 2004

Mr. Christopher J. Morse  
Federal Election Commission  
999 E St., NW  
Washington, DC 20463

Dear Mr. Morse:

This letter is in response to the RFAI dated June 9, 2004 regarding the 2003 Year End Report (12/01/03-12/31/03).

1. The Illinois Republican Party states on all of its solicitations that Federal law requires political committees to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 per calendar year. For any individual that does not provide this information at the time of the contribution a letter is sent to them within 30 days of the contribution that exceeded an aggregate of \$200 in the calendar year. The letter that is sent clearly asks for the missing information, without soliciting a contribution, informs the contributor of the requirements of Federal law for the reporting of such information and allows the contributor to respond via phone, fax, email or by using the pre-addressed envelope that we have provided. I have provided additional employer and occupation information on this amendment for those individuals that we have received additional information for.

2. Salaries and wages for those employees of the Illinois Republican Party which spent more than 25 percent of their compensated time in a given month on FEA were reported on Schedule B line 21(b) for Non-allocable disbursements in error. The salaries and wages have been moved to Schedule B line 30(b).

3. Schedule B line 21(b) of the report discloses payments for "Telemarketing Services", "Direct Mail Services" and "Mailing Services" totaling \$27,426.15. The disbursements for "Telemarketing Services" totaling \$1,413.62 are for Non-FEA fundraising expenses for the Party and because these expenses therefore do not meet the definition of FEA under 11 CFR 100.24, they are itemized on the proper line and no amendment is necessary. To clarify the nature of these expenses, however, the "purpose" of these entries has been expanded to include "Non-FEA" for these expenses.

The disbursements for "Telemarketing Services", "Direct Mail Services" and "Mailing Services" in the amount of \$26,012.53 does meet the definition of FEA under 11 CFR 100.24 and have been moved to Schedule B line 30(b). These disbursements do not however contain express advocacy as defined under 11 CFR 100.22.

4. Schedule H4 supporting line 21(a) disclosing payments for "Employee Tax" and "Health Insurance" has been adjusted so that the amount of these expenses that are attributable to employees of the Illinois Republican Party who spent more than 25 percent of their compensated time on FEA has been moved to Schedule B line 30(b). The amount of these payments that were attributable to employees who spent less than 25 percent of their compensated time on FEA has been adjusted to 100 percent non-federal on Scheule H4 supporting line 21(a).

5. Schedule H4 supporting line 21(a) discloses payments for "Mailing Services" and "Telemarketing Services"; the payments for "Mailing Services" are Non-FEA generic mailing services. The payment for "Telemarketing Services" upon further review does constitute FEA under 11 CFR 100.24 and has been moved to Schedule B line 30(b). A transfer from the Illinois Republican Party's Federal account to the Non-Federal account will be documented in the Party's 2004 August Monthly Report.

If you should require additional information regarding this matter please feel free to contact me at 217/525-0011.

**ETEXT ATTACHMENT**

Bradley A. Burnett

Illinois Republican Party

Assistant Treasurer

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